

## Thomas Affidavit Exhibit D

**Kathryn Thomas**

---

**From:** Kathryn Thomas  
**Sent:** Friday, July 08, 2016 2:24 PM  
**To:** 'David Rothstein (drothstein@rothsteinlawfirm.com)'  
**Cc:** 'Helms, Kathy Dudley (Kathy.Helms@ogletreedeakins.com)'  
**Subject:** Irani's objections to bills of costs

David –

I had asked that you provide this information by yesterday. Do you intend to provide any of the requested information?

---

**From:** Kathryn Thomas  
**Sent:** Wednesday, June 29, 2016 10:49 PM  
**To:** David Rothstein ([drothstein@rothsteinlawfirm.com](mailto:drothstein@rothsteinlawfirm.com))  
**Cc:** Helms, Kathy Dudley ([Kathy.Helms@ogletreedeakins.com](mailto:Kathy.Helms@ogletreedeakins.com))  
**Subject:** Irani's objections to bills of costs

David –

Please provide the following, all of which are within the scope of Defendants' discovery requests and are needed to respond to your objections to the USC Defendants' bill of costs:

- 1) Copies of Dr. Irani's 2015 tax returns, with all attachments and supporting documentation, including W-2's, 1099's, and support for all itemized deductions.
- 2) Employer-provided statements showing all of Dr. Irani's 2016 gross income year-to-date.
- 3) All documentation relating to the Uber class action, of which Dr. Irani is a class member, for which Dr. Irani is to receive a portion of the recent \$100,000,000 settlement paid by Uber.
- 4) Documentation evidencing Dr. Irani's attorneys' fees and costs in the California matter.
- 5) Documentation of Dr. Irani's obligations and payments of attorney's fees and costs relating to this lawsuit, including his fee agreement with you or an accurate and sufficient description of his legal obligations to pay you. We know that you purchased, on Dr. Irani's behalf, written transcripts of all depositions taken in this case as well as the audio-video recordings of the depositions of Dr. Irani and Dr. Koon, but we do not have copies of all of your invoices.
- 6) Documentation of all of Dr. Irani's debt, as described in his declaration and your objections to costs.

Your objections to Defendants' bills of costs bring all of these matters into current issue. We are entitled and obligated to respond to these matters for the Court's consideration. Please provide this information by Thursday of next week, so that we may timely respond to your objections.

Kathryn Thomas  
 Certified Specialist in Employment and Labor Law  
 Gignilliat, Savitz & Bettis, LLP  
 900 Elmwood Avenue, Suite 100  
 Columbia, SC 29201  
 (803) 799-9311  
 (803) 799-1270 (direct line)